

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Applicant(s):	Sang-Soo KIM; Dong-Gyu KIM		
Assignee:	Samsung Electronics Co., Ltd.		
Title:	THIN FILM TRANSISTOR ARRAY PANEL		
Application No.:	10/522,848	Filing Date:	September 20, 2005
Examiner:	Howard WEISS	Group Art Unit:	2814
Docket No.:	PANK01410 US (was AB-1410 US)	Confirmation No.:	9371

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PRE-APPEAL BRIEF REQUEST FOR REVIEW

Dear Sir:

In response to the Final Office Action having a mailing date of May 19, 2009,

Applicants hereby submit this Pre-Appeal Brief Request for Review.

REMARKS

The Rejections under 35 U.S.C. § 103(a)

Claims 1-2, 5, 9-10, 12-14, and 17-19 are rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,668,032 to *Holmberg et al.* (“*Holmberg*”) in view of U.S. Patent No. 6,861,665 to *Kim* (“*Kim*”). Claims 7, 16, and 20 are rejected under 35 U.S.C. § 103(a) as being unpatentable over *Holmberg* in view of *Kim*, and in further view of U.S. Patent No. 6,621,537 to *Nakamura et al.* (“*Nakamura*”). Applicant respectfully traverses, noting that none of *Holmberg*, *Kim*, or *Nakamura* discloses every element of Applicants’ claims. More specifically, none of these references discloses a TFT array panel with two common bars of different widths. Additionally, no motivation to combine these references has been offered.

Holmberg does not disclose two common bars having differing widths. This is noted by the Examiner (Final Office Action, p. 3). Furthermore, inspection of *Holmberg* does not appear to show any pairs of common bars having differing widths.

Examiner asserts that *Holmberg* teaches adjusting the widths of common bars “to provide ESD protection and to allow testing” (Final Office Action, pp. 3-4). This is, respectfully, incorrect. *Holmberg* at most only teaches shorting bars connected to resistors, where it is the magnitude of the resistors that allows for ESD protection and testing, not the widths of the shorting bars: “[t]he magnitude of the resistors 104, 106, 108 and 110 allow the displays to be tested during the manufacturing steps, while also providing ESD protection . . .” (Col. 6:56-59). Indeed, *Holmberg* does not appear to contain any disclosure at all of adjusting the widths of its shorting bars.

However, even if Examiner’s assertion is true, this amounts only to teaching that all common bars should be wide, not that their widths should be different. That is, ESD

protection and testing imply only that common bars should be as wide as possible, for maximum conductivity (ESD protection) and easiest access (testing). Neither ESD protection nor testing provides any reason why common bars should be of differing widths. Thus, even if Examiner's assertion is correct (which does not appear to be the case), *Holmberg* only teaches common bars that are all wide, not common bars whose widths are different.

Kim does not cure this deficiency in *Holmberg*. Examiner asserts that *Kim* discloses "that the resistance of the common (i.e. shorting) bar is dependent upon its width, the wider the bar the lower the resistance" (Final Office Action, p. 3). However, even if true, this only discloses that both shorting bars should be wide, not that the shorting bars should be of different widths. Put differently, even if Examiner is correct, *Kim* at most discloses that its shorting bars should both be of low resistance, not that its shorting bars should be of low but differing resistances.

Nakamura also does not cure this deficiency, as *Nakamura* does not appear to disclose any common bars of different widths.

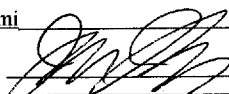
As none of *Holmberg*, *Kim*, or *Nakamura* discloses two common bars of different widths, each of independent claims 1, 2, 5, and 7 is patentable over these references for at least the reason each recites that "the widths of the first and second common bars are different." The remaining pending claims each depend from one of these independent claims, and are thus also patentable for at least this same reason.

Finally, Applicants note that Examiner has offered no motivation to combine any of these references together. Even if Examiner is correct that the widths of two common bars can be made different, Examiner offers no reason why they should be. Accordingly, Examiner has not met his burden of presenting a *prima facie* rejection, and Applicants' claims are patentable for at least this additional reason.

CONCLUSION

In light of the foregoing, Applicant respectfully requests that the rejections be withdrawn and that all the pending claims be allowed. Should any other action be contemplated by the Examiner, please contact the undersigned at (408) 331-1671 to discuss the application.

The Commissioner is authorized to charge any underpayment or credit any overpayment to Deposit Account No. 50-5029 for any matter in connection with this response, including any fee for extension of time and/or fee for additional claims, which may be required.

<p style="text-align: center;">CERTIFICATE OF EFS-WEB TRANSMISSION</p> <p>Certificate of Transmission: I hereby certify that this correspondence is being transmitted to the United States Patent and Trademark (USPTO) via the USPTO's EFS-Web electronic filing system on September 18, 2009.</p> <p>Typed or printed name of person signing this certificate: <u>Jon Y. Ikegami</u></p> <p>Signature: </p>

Respectfully submitted,



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